

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

No. 03-MD-01570 (GBD) (SN)

This document relates to: *All Actions*

ORAL ARGUMENT REQUESTED

**KREINDLER & KREINDLER LLP'S NOTICE OF MOTION TO STAY  
NONMONETARY SANCTIONS PENDING RESOLUTION OF RULE 72 OBJECTIONS**

PLEASE TAKE NOTICE that, upon the corrected declaration of Andrew J. Maloney, III, dated October 5, 2022, *see* ECF No. 8613; the accompanying supplemental declaration of Andrew J. Maloney, III, dated November 3, 2022; the memorandum of law in support of Kreindler & Kreindler LLP's ("K&K") motion to stay sanctions pending resolution of Rule 72 objections, dated October 4, 2022, *see* ECF No. 8608; and K&K's Rule 72 objections, dated October 25, 2022, *see* ECF No. 8681, K&K will move this Court before the Honorable George B. Daniels, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on December 8, 2022 at 10:00 a.m., for an order pursuant to Rules 62 and 72(a) of the Federal Rules of Civil Procedure and/or the Court's inherent authority, granting a stay of the nonmonetary sanctions entered against K&K in Magistrate Judge Sarah Netburn's Opinion and Order dated September 21, 2022, *see* ECF No. 8544, pending resolution of K&K's Rule 72 objections, and awarding such other and further relief as the Court deems just and proper.<sup>1</sup>

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<sup>1</sup> For the reasons set forth in K&K's Rule 72 objections, the Court should either modify or set aside all sanctions against K&K. *See* Fed. R. Civ. P. 72(a). While the instant motion requests a stay of the nonmonetary sanctions only, K&K has noted in its briefing regarding reasonable monetary sanctions that Magistrate Judge Netburn should stay consideration of such sanctions, pending resolution of K&K's Rule 72 objections, as a matter of judicial economy. *See* ECF No. 8685 at 5-6.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), answering papers shall be served by November 17, 2022.

Dated: November 3, 2022  
New York, New York

Emily Kirsch  
Paul Niehaus  
KIRSCH & NIEHAUS PLLC  
950 Third Avenue, 19th Floor  
New York, NY 10022  
(212) 832-0170  
emily.kirsch@kirschniehaus.com

/s/ Edward M. Spiro  
Edward M. Spiro  
MORVILLO ABRAMOWITZ GRAND  
IASON & ANELLO P.C.  
565 Fifth Avenue  
New York, NY 10017  
(212) 856-9600  
espiro@maglaw.com

*Counsel for Kreindler & Kreindler LLP*